**Solar Energy Business Association of New England**

June 23, 2005

Mary L. Cottrell
Secretary of the Department
Department of Telecommunications and Energy
One South Station – 2nd Floor
Boston, MA 02110

**Re: Distributed Generation; D.T.E. 02-38**

Dear Ms. Cottrell:

I write on behalf of the Solar Energy Business Association of New England ("SEBANE") in response to the Request for Comments issued on June 8, 2005 in Distributed Generation, D.T.E. 02-38.

SEBANE is a nonprofit business association of solar energy companies based or doing business in New England. Its membership includes companies from all sectors of the solar photovoltaic ("PV") industry, including cell and module manufacturers, production equipment manufacturers, component part manufacturers, project developers, and system designers and installers.

SEBANE is one of the participants in the Massachusetts Distributed Generation Collaborative ("DG Collaborative"). Also, SEBANE members have been involved in the vast majority of the interconnection applications under the Model Interconnection Tariff.

SEBANE offers comments on the following issues:

1. The experience with the Model Interconnection Tariff
2. The DG Collaborative's 2005/2006 Work Plan, specifically:
    a. The 10 kW limitation for inverter-based distributed generation ("DG") on radial systems
    b. The 10 kW limitation for inverter-based DG on spot networks
    c. DG in distribution planning
3. The DG Collaborative Process and the Role of the MTC

## 1. The Experience with the Model Interconnection Tariff

SEBANE members have been involved in the vast majority of the interconnection applications under the Model Interconnection Tariff, particularly those applications submitted under the Simplified Process which applies to inverter-based DG of 10 kW or less.

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The Submittal Letter to the DG Collaborative's 2005 Annual Report ("2005 Report") states that "the Interconnection Process appears to be working well." (2005 Report at 4.)

SEBANE heartily agrees. Our members report that:

- All utilities are processing applications and approving interconnections of smaller systems.
- Installers have developed positive working relationships with utility personnel responsible for system approvals.
- Turn around times on applications have been satisfactory.
- As utility experience with individual installers has increased, utilities have been able to introduce processes to further streamline final interconnection approvals, including having installers use electronic communication to document completed installations and to provide sufficient evidence that installation specifications meet requirements. This has enabled utilities to waive witness testing where installers have proven their understanding of and demonstrated their consistent compliance with utility procedures and standards. This, in turn, has reduced the time required and the cost of interconnections.

Overall, the Simplified Process for small systems is working well for PV installers and their customers. SEBANE commends the utilities for their efforts.

## 2. The DG Collaborative's 2005/2006 Work Plan

SEBANE offers the following comments on items that the DG Collaborative has included in its 2005/2006 Work Plan.

### a. For the Simplified Process, the 10 kW limitation for inverter-based DG on radial systems.

The maximum size for the Simplified Process is currently 10 kW. As described above, the process is working very well for those systems. As the utilities gain further experience with DG systems, it would be appropriate to raise this threshold and to allow larger inverter-based systems to use the Simplified Process.

**b. The 10 kW limitation for inverter-based DG on spot networks.**

Given the many concerns raised by the utilities, it seems likely that it will be quite some time before the DG Collaborative recommends a generally available interconnection process for spot networks. The DG Collaborative will continue to work on this issue, but, realistically, it seems that all concerns will be addressed in the near future.

Accordingly, the only systems that will be connected to spot networks are those that fall under what is now a 10 kW threshold. As a result, for spot networks, this threshold is not just the threshold for the "Simplified" interconnection process, but rather is the threshold for any interconnection at all. Accordingly, the DG Collaborative should look carefully at whether the threshold could be raised. This would allow slightly larger systems to be interconnected while the utilities work through their concerns regarding spot network interconnections – concerns that truly apply to much larger systems.

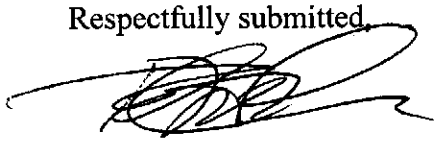
**c. DG in Distribution Planning**

The DG Collaborative has worked, and proposes to continue to work, on the subject of DG in distribution planning. This is a critically important issue. Only when the distribution system benefits of DG are fully recognized will all cost-effective DG be installed in the Commonwealth. SEBANE urges the Department to direct the Collaborative to make this issue a priority going forward.

**3. The DG Collaborative Process and the Role of the MTC**

SEBANE commends the Massachusetts Technology Collaborative ("MTC") for its sponsorship and leadership of the DG Collaborative. The DG Collaborative is addressing are complex and time consuming. Without the efforts of MTC, this good work simply would not continue.

Respectfully submitted,



Paul W. Gromer